

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

Case No. 25-cv-10676-BEM

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

**PLAINTIFFS' EMERGENCY MOTION ON BEHALF OF CLASS MEMBERS E.A.H.,
J.M.R., T.N., J. M.-G., K.M., D.D., N.M., AND T.T.P. TO ENFORCE ORDER ON
REMEDY (DKT. 119) AND ALTERNATIVE MOTION FOR INDIVIDUAL
TEMPORARY RESTRAINING ORDERS AND PRELIMINARY INJUNCTIONS**

Plaintiffs respectfully request that the Court grant this Emergency Motion to Enforce Order on Remedy and Alternate Motion for Temporary Restraining Orders and Preliminary Injunctions. The grounds for this motion are set forth in the accompanying memorandum of law, exhibits in support thereof, and the applicable law. A proposed order also accompanies this motion.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Plaintiffs believe that the Court can rule on the motion for a temporary restraining order without further hearing but will be available in the event that the Court schedules a hearing.

Respectfully submitted,

s/ Trina Realmuto

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** Admitted pro hac vice*

Dated: June 23, 2025

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

I certify that, in accordance with Local Rule 7.1(a)(2), I emailed Defendants' counsel Mary Larakers, Matthew Seamon, Elianis Perez, and Jonathan Guynn at 4:45 pm on June 23, 2025, to inform counsel that Plaintiffs intended to file this motion. Ms. Larakers acknowledged receipt of the email at 5:39 pm. But, as of the time of this filing, Defendants have not provided any substantive response.

This communication was an attempt to resolve the issues raised in this motion, but the parties were unable to reach a resolution.

s/ Trina Realmuto
Trina Realmuto